



# PUBLIC NOTICE

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## **WIRELINE COMPETITION BUREAU ANNOUNCES SEVEN VOICE SERVICE PROVIDERS QUALIFIED FOR STIR/SHAKEN EXEMPTION**

**WC Docket Nos. 17-97, 20-68**

By this Public Notice, the Wireline Competition Bureau (Bureau) announces that seven voice service providers demonstrated that they meet the criteria for an exemption under The Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act section 4(b)(2)(A) and the Commission's rules:<sup>1</sup> AT&T Services Inc. (AT&T), Bandwidth Inc. (Bandwidth), Charter Communications, Inc. (Charter), Comcast Cable Communications, LLC (Comcast), Cox Communications, Inc. (Cox), Cellco Partnership, d/b/a Verizon Wireless (Verizon Wireless), and Vonage Holding Corp. (Vonage).

The TRACED Act directs the Commission, by December 30, 2020, to exempt from its caller ID authentication implementation mandates voice service providers that the Commission determines meet certain early implementation benchmarks.<sup>2</sup> The Commission found that the TRACED Act creates two exemptions: one for Internet Protocol (IP) networks and one for non-IP networks.<sup>3</sup> To receive the IP exemption, a voice service provider must (i) have undertaken the network preparations necessary to deploy the STIR/SHAKEN protocols on its network; (ii) have completed formal registration (including payment) and testing with the Policy Administrator; (iii) have completed the necessary network upgrades to at least one network element to enable the authentication and verification of caller ID information consistent with the STIR/SHAKEN standards; and (iv) reasonably foresee that it will have completed all necessary network upgrades to its network infrastructure to be able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners by June 30, 2021.<sup>4</sup> To receive the non-IP exemption, a voice service provider must (i) upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls, and fully implement the STIRSHAKEN framework throughout its network, or have been working to develop a non-IP authentication solution; and (ii) reasonably foresee that it will have completed all necessary network upgrades to its infrastructure to be able to authenticate and verify caller ID information for all non-IP calls originating or terminating on its network as provided by a standardized caller ID authentication framework for non-IP networks.<sup>5</sup>

The Commission adopted rules allowing voice service providers to file sworn certifications

<sup>1</sup> Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105 (2019) (TRACED Act) § 4(b)(2); 47 CFR § 64.6306.

<sup>2</sup> TRACED Act § 4(b)(2).

<sup>3</sup> *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136, at 53, para. 102 (Oct. 1, 2020) (*Second Caller ID Authentication Report and Order*).

<sup>4</sup> 47 CFR § 63.6403(a); *Second Caller ID Authentication Report and Order*, at 54-57, paras. 106-13.

<sup>5</sup> 47 CFR § 63.6403(b); *Second Caller ID Authentication Report and Order*, at 57-58, paras. 114-16.

explaining in detail how they meet the criteria necessary for an exemption.<sup>6</sup> The deadline for filing certifications was December 1, 2020.<sup>7</sup> The Commission directed the Bureau to review the certifications and issue a list of parties that filed complete certifications and received the exemption by December 30, 2020.<sup>8</sup> Because the exemptions are, by their nature, based on a voice service provider's prediction of its future ability to implement caller ID authentication, those voice service providers that receive an exemption will be required to file an implementation verification certification in a second certification round after June 30, 2021, stating whether they, in fact, achieved the implementation goals to which they committed in their first certifications.<sup>9</sup>

The Bureau received eight timely exemption certifications. Seven voice service providers filed certifications requesting an IP network exemption: AT&T, Bandwidth, Charter, Comcast, Cox, Verizon Wireless, and Vonage. The following companies filed collectively, requesting the non-IP exemption in one certification: Bayland Telephone, LLC, Borderland Communications, LLC, Brown County C-LEC, LLC, Lakefield Telephone Company, LLC, Net Lec, LLC, Niagara Telephone Company, LLC, Northeast Telephone Company, LLC, and Nsighttel Wireless, LLC, (collectively, Nsight).

We find that AT&T, Bandwidth, Charter, Comcast, Cox, Verizon Wireless, and Vonage qualify for the IP exemption.<sup>10</sup> These voice service providers certified and offered sufficient support to demonstrate that they meet all the criteria for an exemption for their IP networks under TRACED Act section 4(b)(2)(A). They are therefore exempt from the requirements of section 64.6301 of our rules,<sup>11</sup> and are not subject to the requirements therein.<sup>12</sup> The voice service providers that received the exemption must still verify they completed full implementation in accordance with their commitments in the second certification round, after which point the Bureau will issue a Public Notice identifying which voice service providers achieved the implementation goals to which they previously committed.<sup>13</sup> Any voice service providers that cannot certify to full implementation upon the filing of the second certification will lose the exemption and be subject to the general rule requiring full STIR/SHAKEN implementation,

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<sup>6</sup> *Second Caller ID Authentication Report and Order* at 59, para. 117.

<sup>7</sup> *See id.* at 59, para. 119; *Wireline Competition Bureau Provides Directions and Filing Information Regarding Caller ID Authentication Exemption Certifications*, WC Docket No. 20-68, Public Notice, DA 20-1334 (Nov. 9, 2020).

<sup>8</sup> *Second Caller ID Authentication Report and Order*, at 60, para. 119.

<sup>9</sup> *Id.* at 60-61, para. 121.

<sup>10</sup> We grant the exemption only to AT&T's wireline IP networks. AT&T explains that it recently identified parts of its wireless IP network that are unable to support STIR/SHAKEN, Statement of AT&T in Support of Request for Exemption, WC Docket No. 20-68, at 9, n.28 (filed Dec. 1, 2020), and has requested a one-year extension of the implementation deadline for those parts of its wireless network. Petition of AT&T Services, Inc., for Extension of Implementation Deadline, WC Docket No. 17-97 (filed Nov. 23, 2020). As a result, and by AT&T's own admission, it will not be capable of fully implementing STIR/SHAKEN on its wireless network by the June 30, 2021, deadline. Because AT&T does not reasonably foresee complete STIR/SHAKEN implementation on its wireless network by the June 30, 2021, deadline, we limit its exemption to only its wireline network. *See also* Statement of Verizon Wireless Accompanying its Certification and Request for a Voluntary Exemption under 47 C.F.R. 64.6306(a), WC Docket No. 20-68, at 1, n.1 (filed Dec. 1, 2020) (explaining that its exemption certification regards only its wireless business units in light of a concurrent extension sought by its wireline business units). We note that AT&T's extension petition remains under review, and we offer no view as to its merits in this Public Notice.

<sup>11</sup> 47 CFR § 64.6301.

<sup>12</sup> *See* 47 CFR § 64.6306(a).

<sup>13</sup> *Second Caller ID Authentication Report and Order*, at 60, paras. 121-22.

effective immediately upon release of the Bureau Public Notice identifying which voice service providers achieved the implementation goals to which they previously committed.<sup>14</sup>

We find Nsight does not qualify for the non-IP exemption because it fails to meet either prong. As to the first prong, Nsight was required to explain in detail either how it is working to develop a non-IP solution or how it will upgrade its entire network to allow for the initiation, maintenance, or termination of SIP calls—and its very brief submission does neither. The second prong of the non-IP exemption requires certification that the provider reasonably foresees being able to support a standardized non-IP call authentication framework by June 30, 2021. In September, the Commission determined that no such framework exists.<sup>15</sup> Nsight does not state what framework it will implement or explain why the framework will meet the standard of an “effective” framework notwithstanding the Commission’s recent determination. Accordingly, the Bureau cannot grant Nsight an exemption.

*Additional Information.* For further information, please contact Alexander Hobbs, Attorney Advisor, Competition Policy Division, Wireline Competition Bureau at (202) 418-7433 or by email at [alexander.hobbs@fcc.gov](mailto:alexander.hobbs@fcc.gov).

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<sup>14</sup> *Id.* at 62-63, para. 124. If the Bureau finds that a voice service provider filed its initial certification in bad faith or failed to take good faith steps toward implementation, it will refer the voice service provider to the Enforcement Bureau for possible enforcement action based on filing a false initial certification. *See* 47 CFR § 64.6306(e)(2).

<sup>15</sup> *Second Caller ID Authentication Report and Order*, at 36-37, para. 68 & n.269.